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 12 Ltd., SW Technology Corp., Olivon Manufacturing  
 Co. Ltd., Olivon USA, LLC, Nantong Schmidt  
 13 Optoelectrical Technology Co. Ltd, Pacific Telescope  
 Corp., Corey Lee, David Shen, Sylvia Shen, Jack  
 14 Chen, Jean Shen, Joseph Lupica, Dave Anderson,  
 Laurence Huen

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

17 IN RE TELESCOPES ANTITRUST LITIGATION  
 18 THIS DOCUMENT RELATES TO:

19 AURORA ASTRO PRODUCTS, LLC, PIONEER  
 CYCLING & FITNESS, LLP; and those similarly  
 20 situated,

Plaintiffs,

21 vs.

22 CELESTRON ACQUISITION, LLC, SUZHOU  
 SYNTA OPTICAL TECHNOLOGY CO., LTD.,  
 23 SYNTA CANADA INT'L ENTERPRISES LTD.,  
 SW TECHNOLOGY CORP., OLIVON  
 24 MANUFACTURING CO. LTD., OLIVON USA,  
 LLC, NANTONG SCHMIDT OPTOELECTRICAL  
 25 TECHNOLOGY CO. LTD., NINGBO SUNNY  
 ELECTRONIC CO., LTD., PACIFIC TELESCOPE  
 26 CORP., COREY LEE, DAVID SHEN, SYLVIA  
 SHEN, JACK CHEN, JEAN SHEN, JOSEPH  
 27 LUPICA, DAVE ANDERSON, LAURENCE  
 HUEN, and DOES 1-50,

28 Defendants.

Case No. 5:20-cv-03642-EJD

*Assigned for All Purposes to:*  
*Hon. Edward J. Davila*

**DEFENDANT JACK CHEN'S NOTICE  
 OF JOINDER TO CELESTRON  
 ACQUISITION LLC'S MOTION FOR  
 SUMMARY JUDGMENT, OR IN THE  
 ALTERNATIVE, PARTIAL  
 SUMMARY JUDGMENT  
 [ECF 720]**

Hearing

Date: TBD  
 Time: TBD  
 Crtrm.: 4 (5th Floor)

Compl. Filed: June 1, 2020  
 Trial Setting Conference: May 8, 2025

**TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that Defendant Jack Chen, by and through his undersigned counsel, hereby files the instant joinder to Celestron Acquisition LLC’S Motion For Summary Judgment [ECF 720] filed on March 7, 2025. *See Tatung Co., Ltd. v. Shu Tze Hsu*, 217 F. Supp. 3d 1138, 1151 (C.D. Cal. 2016) (“When reviewing whether to allow a party to join in a motion, the court will allow the founder when ... the parties are so similarly situated that filing an independent motion would be redundant.”); *Vazquez v. Central States Joint Bd.*, 547 F. Supp. 2d 833, 867 (N.D. Ill. 2008) (“[i]t is permissible for a party to adopt the motion of another party when the facts between the parties are essentially the same and the adoption would promote judicial efficiency”); *accord Spencer v. Lunada Bay Boys*, No. CV1602129SJORAOX, 2016 WL 6818757, at \*3 (C.D. Cal. July 22, 2016).

DATED: March 7, 2025

FROST LLP



By: \_\_\_\_\_

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